

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JOHN DOES 1 THROUGH 7,

Plaintiffs,

- against -

THE TALIBAN *et al.*,

Defendant.

No. 20 Misc. 740 (KPF) (SN)

IN RE: TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

No. 03 MD 1570 (GBDN) (SN)

FIONA HAVLISH *et al.*,

Plaintiffs,

- against -

SHEIKH USAMAH BIN-MUHAMMED
BIN-LADEN, a.k.a. OSAMA BIN-LADEN
et al.,

Defendants.

No. 03 Civ. 9848 (GBD) (SN)

**PEACEFUL TOMORROWS' MOTION FOR LEAVE TO FILE BRIEF AS *AMICUS*
*CURIAE***

Non-party, Peaceful Tomorrows respectfully submits this memorandum of law in support of its motion for leave to file the accompanying MEMORANDUM OF LAW OF *AMICUS CURIAE* PEACEFUL TOMORROWS in the above captioned matters. Plaintiff Fiona Havlish, does not object to the filing of the annexed brief. Other counsel for plaintiffs were called and voice mails were left on April 21, 2022, but at the time of the filing of this motion, no response had been received. It is assumed that other parties object to the filing of the annexed brief.

Drawing its name from the words of the great Reverend Doctor Martin Luther King, Jr.,

Peaceful Tomorrows was founded by families of victims of the September 11th attacks who have come together to turn their sorrow into a vision for peace and nonviolent solutions to international conflict. Peaceful Tomorrows works to promote dialogue and alternatives to violent conflict, with the goal of breaking cycles of violence engendered by imperialism, war, and terrorism. Members have travelled to Afghanistan to bear witness to the casualties of the American War on Terror, advocated for Guantanamo Bay torture victims, and implemented programs to combat the rise in Islamophobia that followed the occupation of Iraq and Afghanistan, among other initiatives. As part of the process of finding solidarity with those affected by violence, Peaceful Tomorrows seeks to bring those responsible for the September 11th attacks to justice with a focus on human rights and in accordance with the principles of international law.

The above captioned cases provide an opportunity to hold people, governments, and institutions civilly accountable for their roles in the September 11th attacks. Peaceful Tomorrows has a direct interest in these cases because its members have lost loved ones in the September 11th attacks, and it remains committed to the goal of non-violent accountability and reconciliation.

For the foregoing reasons, Peaceful Tomorrows respectfully submits that the Court should grant leave to file the proposed brief as *amicus curiae*.

Respectfully submitted,

s/ Jacob M. Kaplan

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Attorney for Amicus Curiae

Dated: April 21, 2022